

Exhibit N

MacInnis 8,284,844 Applied to Representative Panasonic and Toyota Accused Products

This claim chart compares independent claim 1 of U.S. Patent No. 8,284,844 (“the MacInnis ’844 patent”) to Panasonic’s MN2WS0210 system on a chip (“SoC”).

On information and belief, Panasonic’s MN2WS0210 SoC is representative of other Panasonic infotainment and high-end car information system SoCs having similar functionality (“Accused Panasonic Infotainment SoCs”).

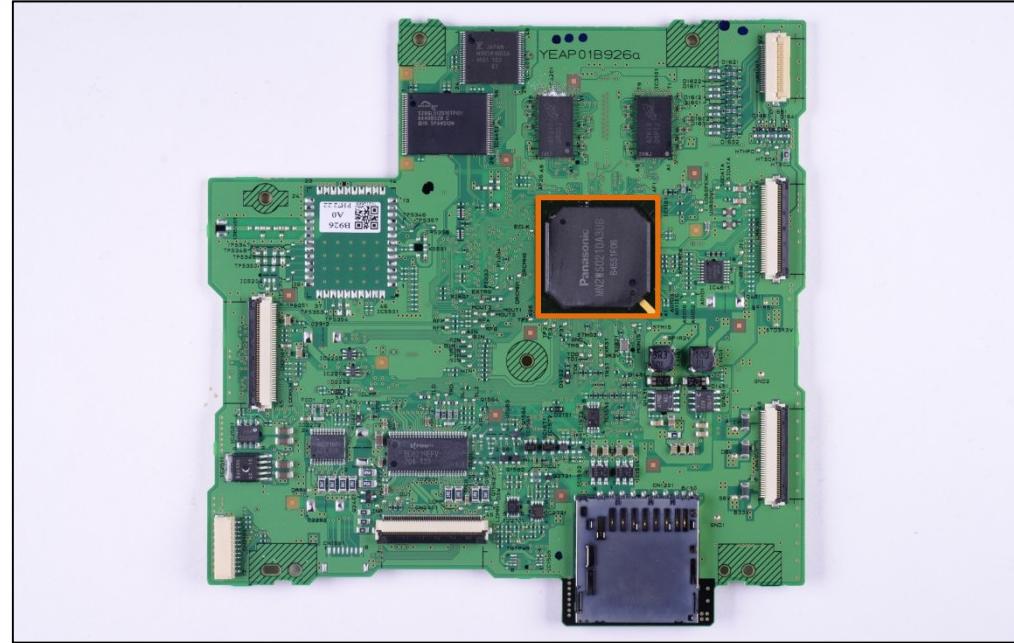
The MN2WS0210 SoC is incorporated in downstream products, including without limitation, Panasonic disc-player assemblies that form Accused Toyota Rear-Seat Infotainments units, including Toyota Sienna Disc Player assembly (86270-45030).

On information and belief the Accused Panasonic Infotainment SoCs, and head units and automobiles that incorporate the Accused Panasonic Infotainment SoCs infringe directly, indirectly, and or under the doctrine of equivalents, at least claim 1 of the MacInnis ’844 patent.

Claim - U.S. Patent No. 8,284,844 (MacInnis)	Application of Claim Language to Accused Product
Claim 1	
A digital media decoding system comprising:	To the extent that the preamble is deemed limiting, the Panasonic MN2WS0210 SoC and downstream products include a digital media decoding system. At least the Panasonic (86270-45030) disc player, which is included in at least the Toyota Sienna Disc Player assembly (86270-45030), includes a Panasonic MN2WS0210 SoC (highlighted in orange).







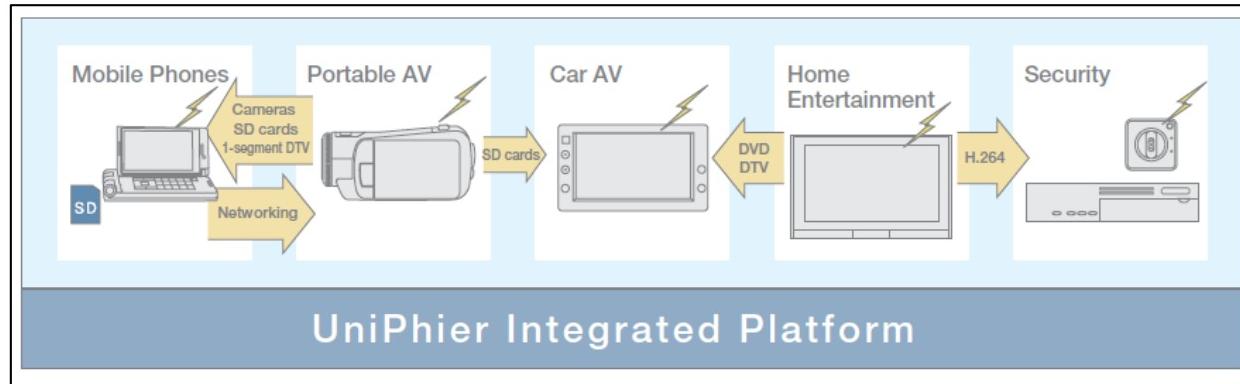
The MN2WS0210 SoC includes a digital media decoding system.

Upon information and belief, the MN2WS0210 SoC is a member of Panasonic's "UniPhier" family of SoCs. *See e.g.*, Ex. 70 – UniPhier Product Sheet at 2 (describing the UniPhier family of SoCs as being included in "Car AV" products).

The UniPhier brings together a range of Panasonic component technologies developed for mobile phones and portable, car, and home audio/video equipment.

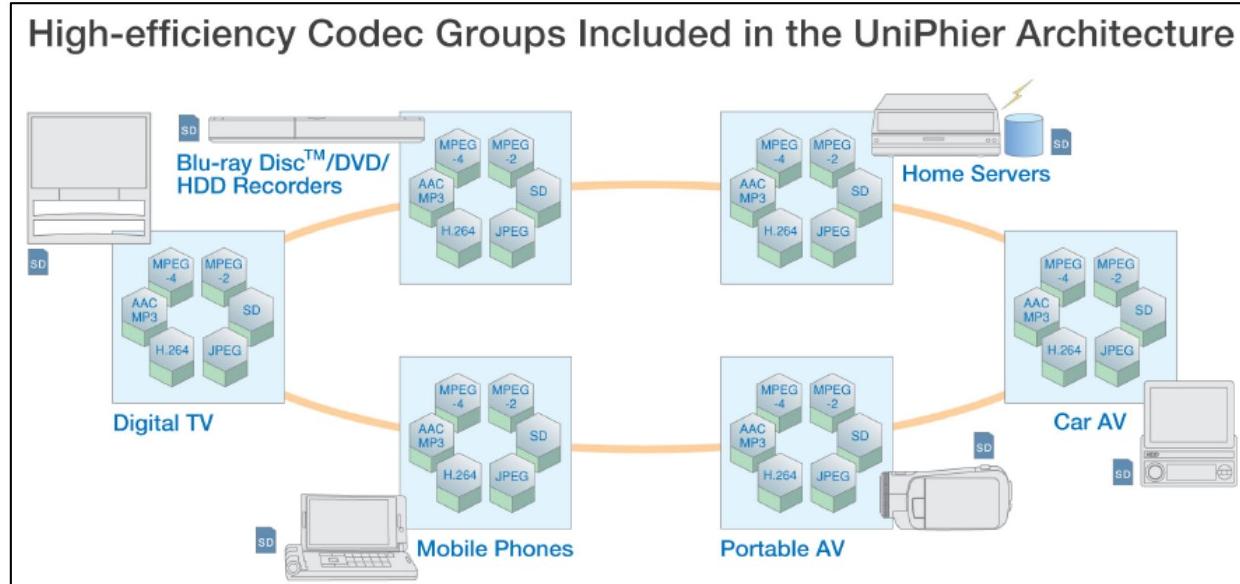
- (1) High-efficiency codec processing delivers high-quality audio and video.
- (2) Optimized power control at the system and semiconductor levels makes it possible to develop low-power LSIs.
- (3) Optimized distribution of audio/video processing and CPU-based application processing enables real-time audio and video processing.
- (4) Hardware- and software-based security forms the basis for a flexible, robust, and secure environment that is capable of protecting the integrity of media content and personal data.

Ex. 70 – UniPhier Product Sheet at 5.

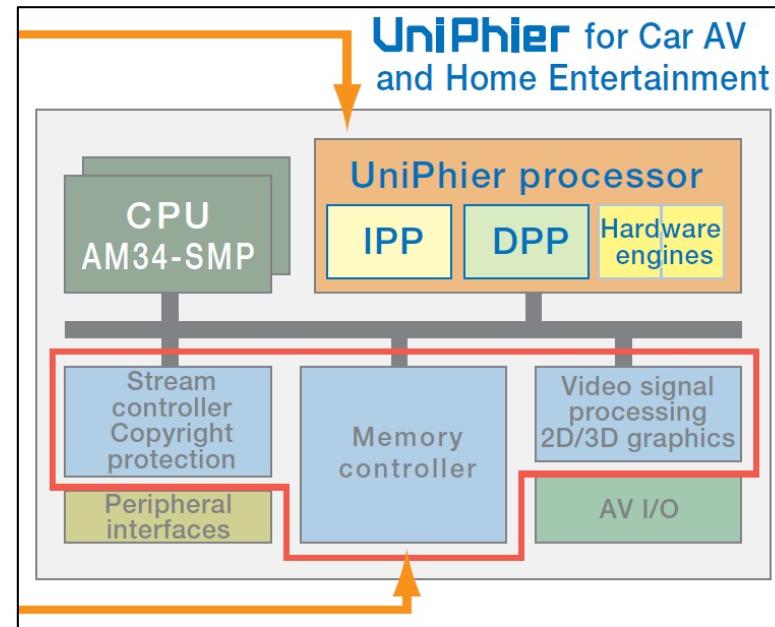


Ex. 70 – UniPhier Product Sheet at 2.

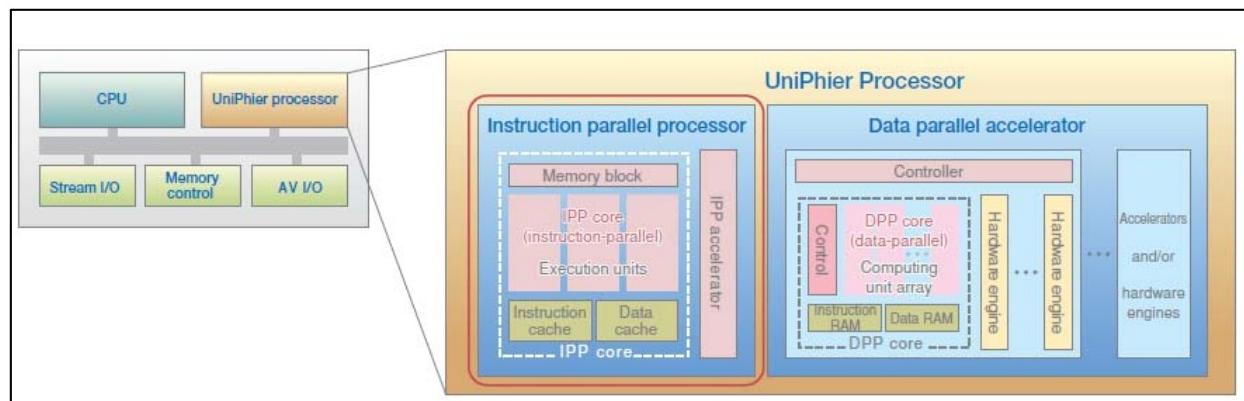
The Car AV UniPhier products, including the MN2WS0210, are capable of decoding several different video encoding standards, such as MPEG-2 and MPEG-4.



	Ex. 70 – UniPhier Product Sheet at 5.
a processor adapted to control a decoding process; and	<p>The MN2WS0210 SoC and downstream products include a processor adapted to control a decoding process.</p> <p>For example, the UniPhier family of SoCs includes “a CPU that provides overall system control,” which includes control of the video decoding process. The UniPhier family of SoCs also includes “a UniPhier processor that offers a standardized media processing architecture by using dedicated libraries to perform codec and other processing.”</p> <div style="border: 1px solid black; padding: 10px;"> <h3 style="text-align: center;">UniPhier Integrated Platform Architecture</h3> <p>The UniPhier integrated platform for digital appliances combines hardware and software elements. Its hardware component consists of a CPU that provides overall system control, a UniPhier processor that offers a standardized media processing architecture by using dedicated libraries to perform codec and other processing, a stream I/O block that performs CPU-independent encryption processing and data transfers, a memory control block with a memory scheduler designed to maximize system performance, and an AV I/O block with a high-performance graphics engine and advanced audio and video input/output capabilities. Its software component consists of device drivers, an operating system, middleware, and a media library (provided in microcode) that implements a variety of codec environments.</p> <p>UniPhier brings the components demanded by the digital appliances of today's age of ubiquitous networking—including high-quality audio/video technology with the power to excite and inspire users, power-saving technologies to conserve energy, real-time capabilities that enable smooth operation, and a secure architecture designed to ensure user safety and peace of mind—together as the system and core technologies of a single integrated platform. UniPhier system LSIs are ideal for applications ranging from mobile phones where low power consumption is a requirement to home entertainment and home networking products that demand high-performance codec processing.</p> </div>
	Ex. 70 – UniPhier Product Sheet at 3 (highlighted).
a hardware accelerator coupled to the processor and adapted to perform a decoding function on a digital media data stream,	<p>The MN2WS0210 SoC and downstream products include a hardware accelerator coupled to the processor and adapted to perform a decoding function on a digital media data stream.</p> <div style="border: 1px solid black; padding: 10px;"> <p>The UniPhier system LSI's hardware platform consists of five components: a UniPhier processor core that incorporates a range of Panasonic audio/video processing technologies developed for dedicated DSP solutions in a variety of product areas, a CPU, and stream I/O, memory control, and AV I/O blocks. Contributing to the UniPhier processor's unique suitability for use in system LSIs that are optimized for specific product areas is its combination of an instruction parallel processor (IPP) with support for the C and C++ languages, exceptional computational performance, low power consumption, a data parallel processor (DPP) for flexible extensibility as dictated by the required system performance, and an assortment of hardware engines and accelerators.</p> </div>



Ex. 70 – UniPhier Product Sheet at 4.



Ex. 70 – UniPhier Product Sheet at 6.

	<p>The MN2WS0210 SoC decodes video that is computationally intensive. For example, Panasonic describes its Car AV UniPhier SoCs as providing “low-power” consumption while decoding “MPEG-4” and “H.264.” Ex. 70 – UniPhier Product Sheet at 5. These claimed capabilities suggest that Panasonic is “offloading” handling of at least some decoding functions from a CPU alone to a hardware accelerator. Ex. 75, Acton Decl. ¶ 13.</p> <p>Therefore, on information and belief, the MN2WS0210 SoC and downstream products comprise “a hardware accelerator coupled to the processor and adapted to perform a decoding function on a digital media data stream.” Ex. 75, Acton Decl. ¶ 13.</p>
wherein the accelerator is configurable to perform the decoding function according to a plurality of decoding methods.	<p>The MN2WS0210 SoC and downstream products include a hardware accelerator that is configurable to perform the decoding function according to a plurality of decoding methods.</p> <p>The UniPhier family of SoCs is capable of decoding multiple video compression standards. For example, the Car AV UniPhier SoCs are capable of decoding video compressed using at least the MPEG2, H.264, and MPEG4 standards. Ex. 70 – UniPhier Product Sheet at 5. Decoding MPEG2-compressed video requires performing several of the same decoding functions as MPEG4 requires. Ex. 75, Acton Decl. ¶ 14. Furthermore, decoding MPEG2-compressed video requires performing those functions according to a different method than MPEG4 requires. Ex. 75, Acton Decl. ¶ 14.</p> <p>Therefore, on information and belief, the MN2WS0210 SoC comprises a hardware accelerator that “is configurable to perform the decoding function according to a plurality of decoding methods.” Ex. 75, Acton Decl. ¶ 14.</p>